

2. The parties have suffered significant delays in this matter due to the impact of the COVID-19 pandemic. As a result of the pandemic, Plaintiff's employer, Beau Rivage Resorts, LLC was ordered closed for over two months. Thereafter, Beau Rivage re-opened at limited capacity and limited staff. Additionally, management, human resources employees responsible for the collection of discovery, and witnesses were furloughed for significant periods.

3. Additionally, Plaintiff's counsel, Daniel Waide is currently scheduled for trials in January and February, which will limit scheduling availability.

4. As a result of the delays caused by the pandemic, the parties respectfully request a ninety (90) day extension of the discovery period, through and including April 5, 2021, and a concomitant extension of the dispositive motion deadline through April 19, 2021. In addition, the parties request that the Court reschedule the settlement conference to allow the parties sufficient time to conduct the necessary depositions prior to the conference.

5. This request for an extension is made in good faith and not for the purpose of delay or to prejudice the rights of any party to this action.

Respectfully submitted this 24th day of November, 2020.

ATTORNEY FOR PLAINTIFF

ATTORNEYS FOR DEFENDANT

/s/ Daniel M. Waide (w/permission)

Daniel M. Waide
1300 Hardy Street
P.O. Box 17738
Hattiesburg, MS 39404

/s/ Kimberly R. Ward

Tammy L. Baker (MB# 104034)
tammy.baker@jacksonlewis.com
Direct Dial: 205-332-3106
Kimberly R. Ward
Kimberly.ward@jacksonlewis.com
Direct Dial: 205-332-3122
Admitted *pro hac vice*

JACKSON LEWIS P.C.

800 Shades Creek Parkway
Suite 870
Birmingham, Alabama 35209
Phone: 205-332-3106
Facsimile: 205-332-3131

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Daniel M. Waide
1300 Hardy Street
P.O. Box 17738
Hattiesburg, MS 39404

/s/ Kimberly R. Ward

Counsel for Defendant